Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Advanced Television Systems and	)	MB Docket No. 87-268
Their Impact Upon the Existing	)	
Television Broadcast Service	)	
	)	

PARTIAL PETITION FOR RECONSIDERATION OF
SEVENTH REPORT AND ORDER AND DTV TABLE

NBC Telemundo License Co. ("NBC Telemundo"), the licensee of KVEA-DT, Corona, California (the "Station"), requests partial reconsideration of the DTV Table with respect to the Station in order to facilitate the digital transition for Spanish-language households in the nation's largest Spanish-language television market. Specifically, NBC Telemundo proposes that the Commission waive the current freeze and approve an increase the Station's effective radiated power to 154 kW at any point after February 17, 2008, subject to Commission grant of an otherwise suitable minor modification application. [1] The Proposal would have a negligible impact on other U.S. television stations, except with respect to a single analog facility that is also ultimately controlled by NBC Telemundo and which has agreed to the limited projected interference to its analog operations that would result from the Proposal during the year prior to the digital transition.

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[1] *See* Technical Exhibit II at 2 (attached) (the "Station Proposal"). For the convenience of the Commission, there are two technical exhibits presented. The first – Technical Exhibit I – addresses the Station Proposal, including potential interference, based on current (and temporary) circumstances until the termination of full-power analog television broadcast service in February 2009. The second specifically addresses the Proposal with regard to interference and other considerations in the post-transition period (i.e., following the termination of full-power analog television broadcast service), although certain concerns noted therein also apply to the pre-transition period.

For the transition to digital television to be as smooth as possible, consumers must be able to enjoy broad access to local digital television signals prior to February 2009 to the extent technically feasible, including during mid- to late 2008 when consumers are most likely to acquire over-the-air digital television receivers. If local digital television signals are not able to reach many consumers because of ongoing power restrictions that all arguably affected stations voluntarily agree are no longer appropriate, consumers are likely to become understandably frustrated with the government's digital television mandate, thinking that they invested hundreds of dollars in a new digital set only to get a blue screen instead of some local stations. For Spanish-language consumers, who disproportionately rely on over-the-air signals, [2] and who have fewer over-the-air outlets available, the availability of strong digital signals from the local Spanish-language stations on which they rely is even more important.

Accordingly, NBC Telemundo seeks additional Commission flexibility with respect to the final DTV allotment for the Station, which is the local affiliate for Telemundo, a leading U.S. Spanish-language television network, in Los Angeles, the largest Spanish-language television market in the nation. Currently, the Station is authorized to operate at approximately one-twentieth of the power authorized for other digital facilities sharing the same antenna location as the Station – Mount Harvard. As a practical matter, such relatively low power operation puts the Station's digital signal at risk compared to the other, higher-powered facilities at the same site, either because the Station's signal is too weak to

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[2] *See, e.g.*, Remarks of Chairman Kevin J. Martin; Congressional Hispanic Caucus Institute Conference: Technology Summit, 2007 FCC Lexis 7147 (Oct. 2, 2007) (citing figures indicating that "almost half (43%) of homes where Spanish is the primary language rely exclusively on over-the-air broadcasting for their television"); Staff Report Concerning Over-the-Air Broadcast Television Viewers, MB Docket 04-210, 2005 FCC LEXIS 1332, *9 (MB 2004).

effectively reach large viewer populations, especially those that may not be able to implement outdoor antennas, or because the nearby higher-powered facilities may degrade the quality of the Station's signal. [3] Other than a single station providing religious programming, the Station has by far the lowest power of any digital full-power television facility transmitting from Mount Harvard. Indeed, a station that operates from Mount Harvard on a digital channel that is adjacent to the Station's digital channel – KPXN-DT – has an authorized power nearly 20 times as great as the Station's (i.e., 1000 kW versus the Station's 54 kW.) [4]

Thus far in the transition period, the Station has had to accept its limited digital operating power because of concerns regarding potential interference to analog operations on Channel 39 by Television Station KNSD, San Diego, California ("KNSD"), a station that is also controlled by NBC Telemundo. During the last year of the transition to digital, however, the Commission should be willing to accept final modifications to the DTV Table that might otherwise have resulted in projected interference to a commonly owned station's analog television operations, assuming that the commonly owned station consents to accept such interference. Such limited flexibility would be consistent with the intent of Section 73.623(g) of the Commission's rules, which authorizes negotiated interference agreements in order to strengthen digital television service. *See* 47 C.F.R. § 73.623(g). Also, unlike during prior stages of the digital transition when the bulk of viewers may have continued to rely on analog over-

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[3] *See* Technical Exhibit II at 1. Although Technical Exhibit II focuses on post-transition circumstances, the concerns highlighted with respect to the desired-to-undesired interference ratio vis-à-vis the Station and adjacent channel KPXN-DT are relevant pre-transition as well.

[4] *See id.*; http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/cdbs/pubacc/prod/eng_tv.pl?Facility_id=58978 (KPXN-DT's CDBS record).

the-air service, individual licensees now may have reason to conclude that limited additional interference to its analog operations is less likely to have a demonstrable effect on an audience that the Commission would like to migrate increasingly to a station's digital service. Because the Commission has been willing to authorize the complete termination of a station's analog service in cases where such termination might facilitate post-digital television transition rollout of new wireless services, depending on the specifics of a particular case, [5] the Commission likewise should be prepared to allow agreed-upon and limited interference to a station's analog television service in order to strengthen the rollout of the digital television services that are the fundamental purpose of the transition.

In this case, KNSD, which is commonly controlled by NBC Telemundo, has reviewed the technical analysis attached to this Petition and is willing to accept the limited predicted interference that might result to KNSD's over-the-air analog service from the Station's proposed power increase at any point during 2008 through the termination of analog full-power service on February 17, 2009. The Station Proposal also limits other potential concerns with the projected interference, as much of the area projected to be affected by any interference appears to be served by another NBC Network affiliate, KNBC(TV), Los Angeles. NBC Telemundo, which controls the licensee of KNSD and is the Station's licensee, also is the licensee of KNBC.

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[5] *See, e.g.*, Letter to Johnson Broadcasting, Inc., DA 06-2319 (Video Div., rel. Nov. 16, 2006); *WLNY, Inc.*, 20 FCC Rcd 14765 (Video Div. 2005).

As important, the Proposal will facilitate the digital transition for many consumers in the nation's second-largest television market (and largest Spanish-language television market). Upon implementation of the Proposal as of or after February 2008, subject to Commission approval, households throughout the Los Angeles DMA will have much improved over-the-air access to the digital Spanish-language broadcasts of the Station. [6] Such access will help to ensure that consumers who invest in digital television sets during 2008 are not frustrated by such early adoption. Since the success of the transition will rely in no small way on individual discussions among consumers, a better result for some consumers who are willing to adopt digital in 2008 may create a virtuous cycle, as these consumers encourage others they know to adopt digital sooner rather than later. As Spanish-language consumers may be especially reliant on over-the-air services, such positive feedback is of particular importance, and further justifies adoption of the Station's proposal.

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[6] See Technical Exhibit II at 1 (projecting addition of 368,394 persons to the Station's digital interference-free coverage post-transition).

CONCLUSION

Given these specific circumstances of common ownership, and with the end of the transition imminent, NBC Telemundo respectfully asks the Bureau to waive any restrictions that would preclude the Station from applying to increase power for its digital operations to 154 kW at any point as of or after February 17, 2008, subject to Commission approval of a suitable permit application.

Respectfully Submitted,

NBC TELEMUNDO LICENSE CO.

F. William LeBeau
Its Assistant Secretary and Senior Regulatory Counsel

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October 26, 2007

TECHNICAL EXHIBIT I
(Technical Analysis of Station Proposal: Pre-Analog Termination)

Technical Statement for KVEA-DT, Corona, California
Reconsideration of Seventh Report & Order, MB Docket No. 87-268
(Interference Analysis Prior to Termination of Analog Service)

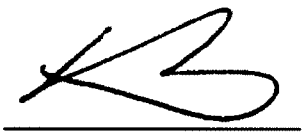
NBC Telemundo License Co. ("NBC Telemundo"), the licensee of KVEA-DT, DTV Channel 39, Corona, California (the "Station"), is requesting Commission approval to increase the effective radiated power ("ERP") of the Station's digital operations to 154 kW (the "Proposal").

In the Seventh Report and Order, the Station was assigned an ERP of 54 kW, which, with the exception of a single other full-power digital station, KTBN-DT, Santa Ana, California, is the lowest ERP of any digital facility transmitting from Mount Harvard. In addition, the Station operates on a channel adjacent to a 1000 kW digital facility also transmitting from Mount Harvard, Digital Television Station KPXN-DT, D38/FCD38, San Bernardino, California. The Station's comparatively low power creates significant concerns regarding over-the-air digital reception of the Station. *See* Technical Exhibit II.

To this point in the digital transition, the Station has not increased power in deference to the analog service of Television Broadcast Station KNSD(TV), Analog Channel 39, San Diego, California. However, the upcoming termination of analog service and the public interest in favor of a smooth consumer transition to digital television has prompted further analysis of the limits of such interference. According to the attached study, the Proposal is projected to cause additional interference to 4.4 percent of the analog service population of KNSD(TV), pending the termination of KNSD(TV)'s analog service by February 17, 2009. The areas subject to the projected interference occur in the northernmost coverage area for KNSD as well as scattered beach areas below cliffs or behind mountains such as Mount Soledad and a few mostly unpopulated mountain peaks to the east. As the attached map demonstrates, much of the land area subject to new interference also is within the service (Grade B) analog contour of KNBC(TV), Los Angeles, California, which, like KNSD(TV), also is an NBC Network affiliate. NBC Telemundo License Co., the licensee of the Station, also is the licensee of KNBC(TV) and controls the licensee of KNSD(TV).

The attached map was created with RadioSoft ComStudy Version 2.2.14.7 using 2 km cells and the OET-69 method of counting cells returning Longley Rice error code 3 as receiving service with no interference. The (blue) contour crossing the coast line at Leucadia is the analog Grade B contour of KNBC(TV), Los Angeles. Green cells show valid KNSD(TV) (analog) reception. Cells receiving new interference are show in pink to red color depending on the degree of interference. (The area of interference on the north side of Mount Soledad in La Jolla is visible as pink to red shading.) Cells that already receive interference from KVEA-DT's current digital operations are colored gray. The green contour lines show the service area of KVEA-DT before and after (larger circle) the proposed power increase.

NBC Telemundo is prepared to accept the interference to the analog service of KNSD(TV) projected by the Proposal in light of the government-mandated termination of analog television service by full-power stations as of February 2009.



H. Douglas Lung
Regional Vice President, Technology
NBC Universal, Inc.

October 26, 2007

TECHNICAL EXHIBIT II
(Technical Analysis of Station Proposal: Post-Analog Termination)

TV Stations KVEA • N52/D39/FCD39 • Corona, California
MB Docket 87-268 Seventh R&O Petition for Reconsideration

Statement of Hammett & Edison, Inc., Consulting Engineers

The firm of Hammett & Edison, Inc., Consulting Engineers, has been retained by NBC Telemundo License Company, licensee of TV Stations KVEA N52/D39/FCD39, Corona, California, to prepare an engineering statement in support of a Petition for Reconsideration of the Seventh Report and Order (R&O) to MB Docket 87-268.

KVEA-DT, FCD39, Requests Increased Power of 154 kW ERP

In the Seventh R&O, KVEA was assigned an effective radiated power (ERP) of 54 kW. However, there is a lower first-adjacent channel DTV Station, KPXN-DT, D38/FCD38, San Bernardino, California, which is authorized an effective radiated power (ERP) of 1,000 kW for both its licensed D38 facilities, and for its FCD38 facilities. Although this station is co-located at the Mt. Harvard antenna farm site with KVEA-DT, it still represents an interference threat to the post-transition KVEA-DT operation, which would be at a 12.7 dB lower power. Although this is less than the -28 dB desired-to-undesired (D/U) interference ratio given in Section 73.623(c)(2) of the FCC Rules defining lower DTV-into-DTV interference, it does raise the likelihood of significant KPXN-DT interference into KVEA-DT as a result of different antenna patterns and heights, and differing temporal propagation losses between DTV Channel 38 and DTV Channel 39.

The existing KVEA-DT transmitting antenna is an Andrew Model AL8-E-39 (Custom) antenna, with a rated input power of 10 kW. If the antenna input power were increased to that maximum, the KVEA-DT ERP would increase from 54 kW to 154 kW. As shown by the attached OET-69 interference study, based on the FCC OET-69 software, increasing the KVEA-DT FCD39 from 54 kW to 154 kW would not cause new interference in excess of the 0.1% "*de minimis*" allowance to any other station.

KVEA-DT FCD39 Interference-Free Population Improvements

As shown by the attached Figure 2, providing OET-69 coverage studies for KVEA-DT, FCD39, at both 54 kW ERP and 154 kW ERP, the requested greater power would result in the addition of 368,394 persons (2000 Census) to the KVEA-DT interference-free coverage. It should be noted that these OET-69 studies are based on the FCC method of respecting Longley-Rice Error Code 3 (EC3), which gives "free parking" to KVEA-DT cells returning EC3; that is, those cells are a) assumed to be above threshold and b) not checked for interference. The population with the KVEA-DT EC3 cells is 1,434,797 persons, or 10.2% of the KVEA-DT terrain-limited population.

As shown by the attached Figure 3, if EC3 is ignored (as is done for Satellite Home Viewer Act (SHVA) Longley-Rice calculations), then the proposed higher power would result in the addition of 400,553 persons to the KVEA-DT interference-free population.

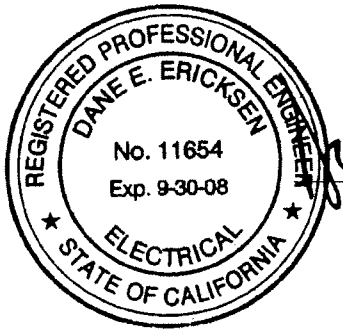
Summary

The Seventh R&O assigned KVEA-DT, FCD39, an ERP of 54 kW, but assigned lower-adjacent channel station KPXN-DT, FCD38, an ERP of 1,000 kW. This disparity in power levels results in increased likelihood of KPXN-DT-into-KVEA-DT interference. The existing KVEA-DT transmitting antenna could have its ERP increased to 154 kW before reaching its rated maximum antenna input power. Increasing the KVEA-DT FCD39 from 54 kW to 154 kW, with no other changes, would increase the KVEA-DT interference-free population by more than three hundred thousand persons (and by more than four hundred thousand persons if the more realistic ignore-EC3 approach is used). The requested KVEA-DT power would not cause in excess of 0.1% "*de minimis*" additional interference, and so it would be in the public interest to modify the KVEA-DT FCD39 power from 54 kW to 154 kW.

List of Figures

In carrying out these engineering studies, the following attached figures were prepared under my direct supervision:

1. OET-69 interference study for KVEA-DT, FCD39 at 154 kW ERP
2. OET-69 coverage studies for KVEA-DT, FCD39, at 54 kW and at 154 kW (EC3 Respected)
3. OET-69 coverage studies for KVEA-DT, FCD39, at 54 kW and at 154 kW (EC3 Ignored).



Dane E. Ericksen, P.E.

October 25, 2007

TV Stations KVEA • N52/D39/FCD39 • Corona, California
MB Docket 87-268 Seventh R&O Petition for Reconsideration

OET-69 Interference Study for Requested Power of 154 kW

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Percent allowed new interference:   0.100
Percent allowed new interference to Class A:   0.100
Census data selected 2000

Post Transition Data Base Selected
/space/software/cdbs/tvdb.sff_B
              TV INTERFERENCE and SPACING ANALYSIS PROGRAM


 Date: 10-23-2007    Time: 15:38:07

 Record Selected for Analysis

 KVEA     USERRECORD-01                CORONA                CA US
 Channel 39 ERP 154.   kW   HAAT  915. m  RCAMSL 01712 m
 Latitude 034-12-48  Longitude 0118-03-41
 Status APP       Zone 2    Border
 Dir Antenna Make CDB  Model 00000000041582  Beam tilt N  Ref Azimuth 0.
 Last update          Cutoff date           Docket
 Comments
 Applicant



 Cell Size for Service Analysis 2.0 km/side

 Distance Increments for Longley-Rice Analysis 1.00 km


 Facility meets maximum height/power limits

    Azimuth      ERP        HAAT   41.0 dBu F(50,90)
     (Deg)       (kW)       (m)         (km)
      0.0       18.224     414.1        76.8
     45.0       10.491     367.8        70.2
     90.0       99.301     669.1       102.7
    135.0      138.940    1426.7       129.4
    180.0      111.795    1516.3       129.5
    225.0      103.833    1422.2       125.9
    270.0       82.424    1091.7       114.1
    315.0       20.404     409.6        77.3



                  Evaluation toward Class A Stations

No Spacing violations or contour overlap to Class A stations

                  Class A Evaluation Complete
```

TV Stations KVEA • N52/D39/FCD39 • Corona, California
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OET-69 Interference Study for Requested Power of 154 kW

SPACING VIOLATION FOUND BETWEEN STATION

KVEA 39 CORONA CA USERRECORD01

and station

SHORT TO: KVEA 39 CORONA CA BLCDT 20030507AAW
034-12-48 0118-03-41
Req. separation 223.7 Actual separation 0.0 Short 223.7 km

LANDMOBILE SPACING VIOLATIONS FOUND

NONE

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quite zone

Proposed facility OK toward Table Mountian

Proposed facility is beyond the Canadian coordination distance

Proposed facility is within the Mexican coordination distance
Distance to border = 205.9km

Proposed station is OK toward AM broadcast stations

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Start of Interference Analysis

Channel	Call	City/State	ARN
	Proposed Station		
39	KVEA	CORONA CA	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
38	KPXN	SAN BERNARDINO CA	0.1	CP MOD	BMPCDT -20021126AAU
40	KNSD	SAN DIEGO CA	198.3	CP MOD	BMPCDT -20041029AHV

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Analysis of Interference to Affected Station 1

Analysis of current record

Channel	Call	City/State	Application Ref. No.

TV Stations KVEA • N52/D39/FCD39 • Corona, California
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OET-69 Interference Study for Requested Power of 154 kW

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   38      KPXN       SAN BERNARDINO CA          BMPCDT    -20021126AAU

     Stations Potentially Affecting This Station

Chan   Call      City/State           Dist(km) Status  Application Ref. No.
 38   KSEE     FRESNO CA                341.0  LIC    BLCDT     -20050914AAZ
 39   KVEA     CORONA CA                  0.1  APP    USERRECORD-01

 Total scenarios =   1


Result key:        1
Scenario        1  Affected station        1
Before Analysis

Results for: 38A CA SAN BERNARDINO       BMPCDT    20021126AAU  CP
   HAAT  909.0 m, ATV ERP 1000.0 kW
                                  POPULATION   AREA (sq km)
   within Noise Limited Contour    15681311      33914.8
   not affected by terrain losses  14424067      23338.2
   lost to NTSC IX                        0          0.0
   lost to additional IX by ATV           0          0.0
   lost to ATV IX only                    0          0.0
   lost to all IX                         0          0.0

 Potential Interfering Stations Included in above Scenario     1


After Analysis

Results for: 38A CA SAN BERNARDINO       BMPCDT    20021126AAU  CP
   HAAT  909.0 m, ATV ERP 1000.0 kW
                                  POPULATION   AREA (sq km)
   within Noise Limited Contour    15681311      33914.8
   not affected by terrain losses  14424067      23338.2
   lost to NTSC IX                        0          0.0
   lost to additional IX by ATV        9276          8.0
   lost to ATV IX only                 9276          8.0
   lost to all IX                      9276          8.0

 Potential Interfering Stations Included in above Scenario     1

39A CA CORONA               USERRECORD01           APP

Percent new IX =    0.0643%

Worst case new IX    0.0643% Scenario      1

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     Analysis of Interference to Affected Station   2
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TV Stations KVEA • N52/D39/FCD39 • Corona, California
MB Docket 87-268 Seventh R&O Petition for Reconsideration

OET-69 Interference Study for Requested Power of 154 kW

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Analysis of current record
Channel     Call          City/State        Application Ref. No.
   40      KNSD       SAN DIEGO CA             BMPCDT    -20041029AHV

     Stations Potentially Affecting This Station

Chan   Call      City/State          Dist(km) Status  Application Ref. No.
 40    KBLR     PARADISE NV            408.6  CP MOD BMPCDT    -20000501AEX
 41    KLCS     LOS ANGELES CA         199.4  LIC    BLEDT     -20030507AAS
 39    KVEA     CORONA CA              198.3  APP    USERRECORD-01

 Total scenarios =   1


Result key:        2
Scenario        1  Affected station       2
Before Analysis

Results for: 40A CA SAN DIEGO            BMPCDT    20041029AHV  CP
   HAAT  563.0 m, ATV ERP  370.0 kW
                                 POPULATION   AREA (sq km)
   within Noise Limited Contour     3071788      31702.8
   not affected by terrain losses   2976425      27002.3
   lost to NTSC IX                        0          0.0
   lost to additional IX by ATV        5976         28.1
   lost to ATV IX only                 5976         28.1
   lost to all IX                      5976         28.1

 Potential Interfering Stations Included in above Scenario     1

41A CA LOS ANGELES          BLEDT     20030507AAS  LIC

After Analysis

Results for: 40A CA SAN DIEGO            BMPCDT    20041029AHV  CP
   HAAT  563.0 m, ATV ERP  370.0 kW
                                 POPULATION   AREA (sq km)
   within Noise Limited Contour     3071788      31702.8
   not affected by terrain losses   2976425      27002.3
   lost to NTSC IX                        0          0.0
   lost to additional IX by ATV        8277         36.1
   lost to ATV IX only                 8277         36.1
   lost to all IX                      8277         36.1

 Potential Interfering Stations Included in above Scenario     1

41A CA LOS ANGELES          BLEDT     20030507AAS  LIC
39A CA CORONA               USERRECORD01           APP

Percent new IX =    0.0775%

Worst case new IX    0.0775% Scenario      1

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TV Stations KVEA • N52/D39/FCD39 • Corona, California
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OET-69 Interference Study for Requested Power of 154 kW

Analysis of Interference to Affected Station 3

Analysis of current record

Channel	Call	City/State	Application Ref. No.
39	KVEA	CORONA CA	USERRECORD-01

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
38	KPXN	SAN BERNARDINO CA	0.1	CP MOD	BMPCDT -20021126AAU
40	KNSD	SAN DIEGO CA	198.3	CP MOD	BMPCDT -20041029AHV

Total scenarios = 1

Result key: 3
Scenario 1 Affected station 3
Before Analysis

Results for: 39A CA CORONA USERRECORD01 APP
HAAT 915.0 m, ATV ERP 154.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	15937066	35105.1
not affected by terrain losses	14511457	26616.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	39958	124.2
lost to ATV IX only	39958	124.2
lost to all IX	39958	124.2

Potential Interfering Stations Included in above Scenario 1

38A CA SAN BERNARDINO	BMPCDT	20021126AAU	CP
40A CA SAN DIEGO	BMPCDT	20041029AHV	CP

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FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED

TV Stations KVEA • N52/D39/FCD39 • Corona, California
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OET-69 Coverage Studies for 54 kW ERP and for 154 kW ERP
Error Code 3 Respected

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OET-69 Coverage Analysis, 2000 Census
tvstudy v3.2.12

Post-transition study, in-core DTV and LPTV/Class A NTSC only

Station record parameters:
          Station: D39   KVEA TCD
             City: CORONA, CA
      Facility ID:   19783
      Coordinates: N  34-12-48.0
                   W 118-03-41.0
      Height AMSL: 1712.0 m
      Maximum ERP:  54.0 kW
  Azimuth pattern: AND-AL-E-39 (CUSTOM)
      Orientation:   0.0
Elevation pattern: OET-69 generic
    Service level: 41.1 dBu
```

			Total IX		Unique IX	
Interfering station			Area,km2	Population	Area,km2	Population
D38	KPXN TCD	SAN BERNARDINO, CA	32.1	17,789	32.1	17,789
D40	KNSD TCD	SAN DIEGO, CA	20.0	2,113	20.0	2,113
N38+A	KPSP-LP LIC	CATHEDRAL CITY-, CA	0.0	0	0.0	0
N39-A	KABE-LP CP	BAKERSFIELD, CA	8.0	685	8.0	685

Service conditions	Area,km2	Population
Noise-limited service	20643.2	15,400,411
Terrain-limited service	14168.1	14,121,546
Interference-free service	14108.0	14,100,959
Longley-Rice errors	6511.1	1,434,797

Note:
The results of the OET-69 algorithm are dependent on the use of computer databases and complex software algorithms, which may vary between computer platforms and installations. Also, while Hammett & Edison, Inc. endeavors to follow official releases and established precedents on the matter, FCC policy on DTV analysis methods changes from time to time. Thus, the results of OET-69 interference and coverage studies are subject to change and may differ from FCC results.

TV Stations KVEA • N52/D39/FCD39 • Corona, California
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OET-69 Coverage Studies for 54 kW ERP and for 154 kW ERP
Error Code 3 Respected

OET-69 Coverage Analysis, 2000 Census
tvstudy v3.2.12

Post-transition study, in-core DTV and LPTV/Class A NTSC only

Station record parameters:

	--Modified--	--Original--
Station:	D39 KVEA TCD	D39 KVEA TCD
City:	CORONA, CA	CORONA, CA
Facility ID:	19783	19783
Coordinates:	N 34-12-48.0	N 34-12-48.0
	W 118-03-41.0	W 118-03-41.0
Height AMSL:	1712.0 m	1712.0 m
Maximum ERP:	154 kW	54.0 kW
Azimuth pattern:	AND-AL-E-39 (CUSTOM)	AND-AL-E-39 (CUSTOM)
Orientation:	0.0	0.0
Elevation pattern:	OET-69 generic	OET-69 generic
Service level:	41.1 dBu	41.1 dBu

		Total IX		Unique IX	
Interfering station		Area,km2	Population	Area,km2	Population
D38 KPXN TCD	SAN BERNARDINO, CA	28.1	15,156	28.1	15,156
D40 KNSD TCD	SAN DIEGO, CA	56.1	25,771	56.1	25,771
N38+A KPSP-LP LIC	CATHEDRAL CITY-, CA	0.0	0	0.0	0
N39-A KABE-LP CP	BAKERSFIELD, CA	24.0	9,225	24.0	9,225

Service conditions	Area,km2	Population
Noise-limited service	23951.2	15,932,012
Terrain-limited service	16352.3	14,519,504
Interference-free service	16244.0	14,469,352
Longley-Rice errors	7779.3	1,498,096

Note:
The results of the OET-69 algorithm are dependent on the use of computer databases and complex software algorithms, which may vary between computer platforms and installations. Also, while Hammett & Edison, Inc. endeavors to follow official releases and established precedents on the matter, FCC policy on DTV analysis methods changes from time to time. Thus, the results of OET-69 interference and coverage studies are subject to change and may differ from FCC results.

TV Stations KVEA • N52/D39/FCD39 • Corona, California
MB Docket 87-268 Seventh R&O Petition for Reconsideration

OET-69 Coverage Studies for 54 kW ERP and for 154 kW ERP
Error Code 3 Ignored

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OET-69 Coverage Analysis, 2000 Census
tvstudy v3.2.12

Post-transition study, in-core DTV and LPTV/Class A NTSC only

Longley-Rice errors ignored

Station record parameters:
          Station: D39   KVEA TCD
             City: CORONA, CA
      Facility ID:   19783
      Coordinates: N  34-12-48.0
                   W 118-03-41.0
      Height AMSL: 1712.0 m
      Maximum ERP:  54.0 kW
  Azimuth pattern: AND-AL-E-39 (CUSTOM)
      Orientation:   0.0
Elevation pattern: OET-69 generic
    Service level: 41.1 dBu
```

Interfering station			Total IX		Unique IX	
			Area,km2	Population	Area,km2	Population
D38	KPXN TCD	SAN BERNARDINO, CA	100.2	34,657	96.2	34,649
D40	KNSD TCD	SAN DIEGO, CA	20.0	2,113	20.0	2,113
N38+A	KPSP-LP LIC	CATHEDRAL CITY-, CA	0.0	0	0.0	0
N39-A	KABE-LP CP	BAKERSFIELD, CA	40.1	693	36.1	685

Service conditions	Area,km2	Population
Noise-limited service	20643.2	15,400,411
Terrain-limited service	10217.4	13,844,226
Interference-free service	10061.1	13,806,771

Note:
The results of the OET-69 algorithm are dependent on the use of computer databases and complex software algorithms, which may vary between computer platforms and installations. Also, while Hammett & Edison, Inc. endeavors to follow official releases and established precedents on the matter, FCC policy on DTV analysis methods changes from time to time. Thus, the results of OET-69 interference and coverage studies are subject to change and may differ from FCC results.

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Error Code 3 Ignored

OET-69 Coverage Analysis, 2000 Census
tvstudy v3.2.12

Post-transition study, in-core DTV and LPTV/Class A NTSC only

Longley-Rice errors ignored

Station record parameters:

	--Modified--	--Original--
Station:	D39 KVEA TCD	D39 KVEA TCD
City:	CORONA, CA	CORONA, CA
Facility ID:	19783	19783
Coordinates:	N 34-12-48.0	N 34-12-48.0
	W 118-03-41.0	W 118-03-41.0
Height AMSL:	1712.0 m	1712.0 m
Maximum ERP:	154 kW	54.0 kW
Azimuth pattern:	AND-AL-E-39 (CUSTOM)	AND-AL-E-39 (CUSTOM)
Orientation:	0.0	0.0
Elevation pattern:	OET-69 generic	OET-69 generic
Service level:	41.1 dBu	41.1 dBu

		Total IX		Unique IX	
Interfering station		Area,km2	Population	Area,km2	Population
D38 KPXN TCD	SAN BERNARDINO, CA	100.2	32,319	96.2	32,319
D40 KNSD TCD	SAN DIEGO, CA	68.1	25,771	68.1	25,771
N38+A KPSP-LP LIC	CATHEDRAL CITY-, CA	0.0	0	0.0	0
N39-A KABE-LP CP	BAKERSFIELD, CA	36.1	9,225	32.1	9,225

Service conditions	Area,km2	Population
Noise-limited service	23951.2	15,932,012
Terrain-limited service	11943.6	14,274,639
Interference-free service	11743.2	14,207,324

Note:
The results of the OET-69 algorithm are dependent on the use of computer databases and complex software algorithms, which may vary between computer platforms and installations. Also, while Hammett & Edison, Inc. endeavors to follow official releases and established precedents on the matter, FCC policy on DTV analysis methods changes from time to time. Thus, the results of OET-69 interference and coverage studies are subject to change and may differ from FCC results.